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May 17, 2018

## WILLIAM FREDERICK AUSTIN (1930-2016)

OF COUNSEL: JEFFERSON D. GRIFFITH, III

## **VIA, ELECTRONIC FILING**

The Honorable Jocelyn Boyd Chief Clerk and Administrator The Public Service Commission of South Carolina 101 Executive Center Drive Columbia, South Carolina 29210

Re: • SolAmerica SC, LLC and Edgefield County S1, LLC

- Docket 2018-163-E
- Pending Request for Modification and Motion
- Request for Expedited Consideration of Pending Motion to Maintain Status Ouo

Ms. Boyd:

The undersigned represents SolAmerica SC, LLC and Edgefield County S1, LLC (hereinafter together as, "SolAmerica").

The above-referenced Request for Modification and Motion to Maintain Status Quo was electronically filed with this Commission on May 9, 2018. The Request for Modification referenced an Interconnection Agreement ("IA"), on which SolAmerica and South Carolina Electric & Gas Company, ("Company") were both signatories. It is uncontroverted that the IA allowed, in Provision 12.12, for SolAmerica to seek a modification of that Agreement from this Commission, as was done on May 9, 2018.

Despite the fact that the Company was a signatory to the IA described hereinabove, and the fact that SolAmerica had a right to request a modification from this Commission, the Company sent correspondence on May 10, 2018, purporting to terminate the IA. The Company's action came after SolAmerica's Request for Modification and Motion which was e-filed with this Commission on May 9, 2018.

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Because the Company's actions disregarded SolAmerica's rights under the IA and disregarded the fact that this Commission has jurisdiction to modify the IA, SolAmerica through counsel, respectfully request that this Commission expedite its consideration of SolAmerica's pending Motion to Maintain Status Quo.

All parties of record are being served with this filing. Please notify the undersigned if there is anything else you may need in this matter.

Respectfully Submitted, AUSTIN & ROGERS, P.A.

/s/\_\_\_\_

Richard L. Whitt, Counsel for SolAmerica SC, LLC and Edgefield County S1, LLC

RLW/cas